

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

GREGORY COLBURN, et al.,

Defendants.

Case No. 19-CR-10080-NMG

**DEFENDANT I-HSIN “JOEY” CHEN’S INITIAL EXHIBIT LIST**

Defendant I-Hsin “Joey” Chen respectfully submits the following initial list of proposed exhibits for the January 2022 trial brought by the government against himself and fellow defendants Gregory Colburn, and Amy Colburn. Defendant reserves the right to supplement this list with reasonable notice to the government.

Dated: November 19, 2021

Respectfully submitted,

/s/ Reuben Camper Cahn

Reuben Camper Cahn (*pro hac vice*)  
KELLER/ANDERLE LLP  
18300 Von Karman Avenue, Suite 930  
Irvine, California 92612  
Tel. (949) 476-8700  
rcahn@kelleranderle.com

*Counsel for I-Hsin “Joey” Chen*

**CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.2(b), I, Reuben Camper Cahn, hereby certify that on November 19, 2021 this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/Reuben Camper Cahn  
Reuben Camper Cahn

<b>Exhibit No.</b>	<b>Beginning Bates</b>	<b>End Bates</b>
1	VB-RECORDS-00000773	VB-RECORDS-00000774
2	VB-RECORDS-00000775	VB-RECORDS-00000776
3	VB-RECORDS-00000797	VB-RECORDS-00000797
4	VB-RECORDS-00000798	VB-RECORDS-00000799
5	VB-RECORDS-00000800	VB-RECORDS-00000803
6	VB-RECORDS-00001496	VB-RECORDS-00001496
7	VB-RECORDS-00001515	VB-RECORDS-00001516
8	VB-RECORDS-00001642	VB-RECORDS-00001642
9	VB-RECORDS-00001643	VB-RECORDS-00001644
10	VB-RECORDS-00001645	VB-RECORDS-00001649
11	VB-RECORDS-00001650	VB-RECORDS-00001650
12	VB-RECORDS-00001651	VB-RECORDS-00001651
13	VB-RECORDS-00001652	VB-RECORDS-00001652
14	VB-RECORDS-00001653	VB-RECORDS-00001653
15	VB-RECORDS-00001654	VB-RECORDS-00001655
16	VB-RECORDS-00001656	VB-RECORDS-00001656
17	VB-RECORDS-00001657	VB-RECORDS-00001658
18	VB-RECORDS-00001659	VB-RECORDS-00001660
19	VB-RECORDS-00001661	VB-RECORDS-00001661
20	VB-RECORDS-00001662	VB-RECORDS-00001662
21	VB-RECORDS-00001663	VB-RECORDS-00001663
22	VB-RECORDS-00001665	VB-RECORDS-00001665
23	VB-RECORDS-00001670	VB-RECORDS-00001673
24	VB-RECORDS-00001674	VB-RECORDS-00001674
25	VB-RECORDS-00001676	VB-RECORDS-00001677
26	VB-RECORDS-00001678	VB-RECORDS-00001678
27	VB-RECORDS-00001679	VB-RECORDS-00001679

<b>Exhibit No.</b>	<b>Beginning Bates</b>	<b>End Bates</b>
28	VB-RECORDS-00001680	VB-RECORDS-00001680
29	VB-RECORDS-00001681	VB-RECORDS-00001681
30	VB-RECORDS-00001682	VB-RECORDS-00001684
31	VB-RECORDS-00001685	VB-RECORDS-00001687
32	VB-RECORDS-00001688	VB-RECORDS-00001690
33	VB-RECORDS-00001691	VB-RECORDS-00001692
34	VB-RECORDS-00001693	VB-RECORDS-00001694
35	VB-RECORDS-00001695	VB-RECORDS-00001696
36	VB-RECORDS-00001697	VB-RECORDS-00001697
37	VB-RECORDS-00001698	VB-RECORDS-00001698
38	VB-RECORDS-00001699	VB-RECORDS-00001701
39	VB-RECORDS-00001702	VB-RECORDS-00001702
40	VB-RECORDS-00001703	VB-RECORDS-00001703
41	VB-RECORDS-00001704	VB-RECORDS-00001705
42	VB-RECORDS-00001706	VB-RECORDS-00001707
43	VB-RECORDS-00001708	VB-RECORDS-00001708
44	VB-RECORDS-00001709	VB-RECORDS-00001710
45	VB-RECORDS-00001711	VB-RECORDS-00001712
46	VB-RECORDS-00001713	VB-RECORDS-00001714
47	VB-RECORDS-00001715	VB-RECORDS-00001715
48	VB-RECORDS-00001716	VB-RECORDS-00001717
49	VB-RECORDS-00001718	VB-RECORDS-00001720
50	VB-RECORDS-00001723	VB-RECORDS-00001723
51	VB-RECORDS-00001724	VB-RECORDS-00001724
52	VB-RECORDS-00001725	VB-RECORDS-00001725
53	VB-RECORDS-00001726	VB-RECORDS-00001726
54	VB-RECORDS-00001727	VB-RECORDS-00001727

<b>Exhibit No.</b>	<b>Beginning Bates</b>	<b>End Bates</b>
55	VB-RECORDS-00001728	VB-RECORDS-00001730
56	VB-RECORDS-00001731	VB-RECORDS-00001734
57	VB-RECORDS-00001806	VB-RECORDS-00001817
58	VB-RECORDS-00001818	VB-RECORDS-00001821
59	VB-RECORDS-00001822	VB-RECORDS-00001824
60	VB-RECORDS-00001827	VB-RECORDS-00001828
61	VB-RECORDS-00001829	VB-RECORDS-00001830
62	VB-RECORDS-00001837	VB-RECORDS-00001840
63	VB-RECORDS-00001873	VB-RECORDS-00001894
64	VB-RECORDS-00001896	VB-RECORDS-00001899
65	VB-RECORDS-00001900	VB-RECORDS-00001921
66	VB-RECORDS-00001923	VB-RECORDS-00001924
67	VB-RECORDS-00052055	VB-RECORDS-00052060
68	VB-RECORDS-00052774	VB-RECORDS-00052775
69	VB-RECORDS-00052776	VB-RECORDS-00052777
70	VB-RECORDS-00052782	VB-RECORDS-00052807
71	VB-RECORDS-00136387	VB-RECORDS-00136388
72	VB-RECORDS-00136392	VB-RECORDS-00136392
73	VB-RECORDS-00136398	VB-RECORDS-00136399
74	VB-RECORDS-00136400	VB-RECORDS-00136401
75	VB-RECORDS-00136402	VB-RECORDS-00136403
76	VB-RECORDS-00585150	VB-RECORDS-00585152
77	VB-RECORDS-00628282	VB-RECORDS-00628282
78	SINGER-VOL006-002942	SINGER-VOL006-002951
79	SINGER-VOL006-003167	SINGER-VOL006-003167
80	SINGER-VOL006-004607	SINGER-VOL006-004609
81	SINGER-VOL016-005298	SINGER-VOL016-005298

<b>Exhibit No.</b>	<b>Beginning Bates</b>	<b>End Bates</b>
82	SINGER-VOL016-019337	SINGER-VOL016-019339
83	SINGER-VOL016-020825	SINGER-VOL016-020837
84	SINGER-VOL016-035201	SINGER-VOL016-035210
85	SINGER-VOL016-035247	SINGER-VOL016-035250
86	SINGER-VOL016-035320	SINGER-VOL016-035325
87	SINGER-VOL016-037606	SINGER-VOL016-037608
88	SINGER-VOL016-038147	SINGER-VOL016-038151
89	SINGER-VOL016-038798	SINGER-VOL016-038810
90	SINGER-VOL016-039282	SINGER-VOL016-039283
91	SINGER-VOL016-039436	SINGER-VOL016-039442
92	SINGER-VOL032-000004	SINGER-VOL032-000016
93	SINGER-LAPTOP-00043138	SINGER-LAPTOP-00043138
94	SINGER-LAPTOP-00043881	SINGER-LAPTOP-00043881
95	SINGER-LAPTOP-00168799	SINGER-LAPTOP-00168801
96	SINGER-LAPTOP-00170795	SINGER-LAPTOP-00170796
97	SINGER-KWF-000042	SINGER-KWF-000042
98	SINGER-REPORTS-000007	SINGER-REPORTS-000016
99	SINGER-REPORTS-000022	SINGER-REPORTS-000025
100	SINGER-REPORTS-000030	SINGER-REPORTS-000032
101	SINGER-REPORTS-000033	SINGER-REPORTS-000038
102	SINGER-REPORTS-000039	SINGER-REPORTS-000044
103	SINGER-REPORTS-000064	SINGER-REPORTS-000066
104	SINGER-REPORTS-000092	SINGER-REPORTS-000096
105	SINGER-REPORTS-000099	SINGER-REPORTS-000102
106	SINGER-REPORTS-000124	SINGER-REPORTS-000130
107	SINGER-PHONE-000536	SINGER-PHONE-000538
108	USAO-VB-00018064	USAO-VB-00018067

<b>Exhibit No.</b>	<b>Beginning Bates</b>	<b>End Bates</b>
109	USAO-VB-00018978	USAO-VB-00018979
110	USAO-VB-00018980	USAO-VB-0018981
111	USAO-VB-00031882	USAO-VB-00031882
112	USAO-VB-00055083	USAO-VB-00055085
113	USAO-VB-00329134	USAO-VB-00329134
114	USAO-VB-00333626	USAO-VB-00333626
115	USAO-VB-00425247	USAO-VB-00425249
116	USAO-VB-00638243	USAO-VB-00638243
117	USAO-VB-00736622	USAO-VB-00736623
118	USAO-LP-001104	USAO-LP-001162
119	USC-REPORTS-000084	USC-REPORTS-000085
120	DOJ-SINGER-TIII-00028108	DOJ-SINGER-TIII-00028108
121	CHEN000034	CHEN002953
122	CHEN002954	CHEN005985
123	CHEN005986	CHEN006048
124	CHEN006049	CHEN006052
125	CHEN006053	CHEN006053
126	CHEN006054	CHEN006054
127	CHEN006055	CHEN006055
128	CHEN006056	CHEN006056
129	CHEN006057	CHEN006058
130	CHEN006059	CHEN006061
131	CHEN006062	CHEN006071
132	CHEN006072	CHEN006073
133	CHEN006074	CHEN006075
134	CHEN006076	CHEN006076
135	CHEN006077	CHEN006081

<b>Exhibit No.</b>	<b>Beginning Bates</b>	<b>End Bates</b>
136	CHEN006082	CHEN006098
137	CHEN006099	CHEN006099
138	CHEN006100	CHEN006100
139	CHEN006101	CHEN006111
140	CHEN006112	CHEN006120
141	CHEN006121	CHEN006129
142	CHEN006130	CHEN006138
143	CHEN006139	CHEN006146
144	CHEN006147	CHEN006155
145	CHEN006156	CHEN006163
146	CHEN006164	CHEN006172
147	CHEN006173	CHEN006181
148	CHEN006182	CHEN006189
149	CHEN006190	CHEN006200
150	CHEN006201	CHEN006209
151	CHEN006210	CHEN006217
152	19-cr-10080, Dkt. 972-33	19-cr-10080, Dkt. 972-33
153	19-cr-10080, Dkt. 972-35	19-cr-10080, Dkt. 972-35
154	19-cr-10080, Dkt. 972-42	19-cr-10080, Dkt. 972-42
155	19-cr-10080, Dkt. 1104-1	19-cr-10080, Dkt.1104-1
156	19-cr-10080, Dkt.1104-4	19-cr-10080, Dkt.1104-4
157	<u>Getting In</u> by Rick Singer <sup>1</sup>	
158	<u>Getting In: Personal Brands</u> by Rick Singer <sup>2</sup>	
159	RCTRL0001021110	RCTRL0001021110
160	RCTRL0001023923	RCTRL0001023923

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<sup>1</sup> Publicly available.

<sup>2</sup> Publicly available.



<b>Exhibit No.</b>	<b>Beginning Bates</b>	<b>End Bates</b>
161	RCTRL0001026240	RCTRL0001026240
162	RCTRL0001029025	RCTRL0001029025
163	RCTRL0001030921	RCTRL0001030921
164	RCTRL0001032902	RCTRL0001032902
165	RCTRL0001036948	RCTRL0001036948
166	RCTRL0001053729	RCTRL0001053729
167	RCTRL0001054079	RCTRL0001054079
168	RCTRL0001055050	RCTRL0001055050
169	RCTRL0001060861	RCTRL0001060861
170	RCTRL0001065483	RCTRL0001065483
171	RCTRL0001073852	RCTRL0001073852
172	RCTRL0001080826	RCTRL0001080826
173	RCTRL0001082159	RCTRL0001082159
174	RCTRL0001085751	RCTRL0001085751
175	RCTRL0001095035	RCTRL0001095035
176	RCTRL0001103394	RCTRL0001103394